

original

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF WEST VIRGINIA

STEVEN M. HUNTER

Inmate Number 03704017
Plaintiff,

FILED

JUN - 1 2004

TERESA L. DEPPNER, CLERK
U.S. District & Bankruptcy Courts
Southern District of West Virginia

v.

MARTY L. ANDERSON

RICHARD RUSSELL

SUE ENGLES

5:04-0542

WILLIAM HUTCHINGS

ANDREW BONAT

MATT MIDGLEY

DAVE FARLEY

VICKEY BLANKENSHIP

KEN KEISER

RICHARD FOSTER

DARRELL PRITZ

Dr. MCCLAIN

MICHAEL D. MURRAY

HARLEY LAPPIN

TOM CLIFTON

BILL BARNHART

Dr. ENGLES

CHARLENE BLANCH

CHARLITA LANG

JOHN DOE

JEFF JAMES

DAN GREEN

COMPLAINT

I. Previous lawsuits

A. Have you begun other lawsuits in state or federal court dealing with the same facts involved in this action or otherwise relating to your imprisonment?

Yes _____ No X

B. If your answer to A is yes, describe each lawsuit in the space below. (If there is more than one lawsuit, describe the additional lawsuits on another piece of paper, using the same outline).

1. Parties to this previous lawsuit
Plaintiffs: N/A

Defendants: N/A

2. Court (if federal court, name the district; if state court, name the county):

N/A

3. Docket Number: N/A

4. Name of Judge to whom case
was assigned: N/A

5. Disposition (for example: Was the
case dismissed? Was it appealed?
Is it still pending)?

N/A

6. Approximate date of filing lawsuit:

N/A

7. Approximate date of disposition:

N/A

II. Place of Present Confinement:

FCI Beckley P.O. Box 350 W.V. 26013

A. Is there a prisoner grievance
procedure in this institution?

yes X no

B. Did you present the facts relating to your complaint in the state grievance procedure?

Yes _____ No X

C. If your answer is YES:

1. What steps did you take?

N/A

2. What was the result?

N/A

D. If your answer is NO, explain why not? The prison official keep refusing to provide me the proper Administrative remedies forms ignoring and interfering with my attempts to do so.

III. Parties

(In item A below, place your name and registration number in the first blank and place your present address in the second blank. Do the same for additional plaintiffs, if any).

A. Name of Plaintiff: Steven M. Hunter
03704017

Address: FCI Beckley, P.O. Box 350
W.V. 28513

B. Additional Plaintiffs and Address:
N/A

(In item C below, place the full name of the defendant in the first blank, his/her official position in the second blank, and his/her place of employment in the third blank. Use item D for the names, positions, and places of employment of any additional defendants).

C. Defendant Marty L. Anderson
is employed as the Warden
at FCI Beckley P.O. Box 350, Beaver,
W.V. 28513

D. Additional Defendants: Richard
Russell, is employed as a Associate
Warden at FCI Beckley, SUE
Engles, is employed as a Associate

Warden, at FCI Beckley, William Hutchings, is employed as the Captain, at FCI Beckley, Andrew Bonat, is employed as a unit manager, at FCI Beckley, Matt Midgley, is employed as a Correctional Counselor, at FCI Beckley, Dave Farley, is employed as the Supervisor of Education at FCI Beckley, Vickey Blankenship, is employed as the Principal of Education at FCI Beckley, Ken Helser, is employed as a Physician Assistant at FCI Beckley, Richard Foster, is employed as an Correctional Officer at FCI Beckley, Darrell Pritt, is employed as an Correctional Officer at FCI Beckley, Mr. Wang, is employed as an Chaplain at FCI Beckley, Mr. Blain is employed as an chaplain at FCI Beckley, Michael D. Murray, is employed as the Residential Drug Coordinator at FCI Beckley, Bill Burlington is employed as the Regional Counsel for FCI Beckley, Dr. McLean, is employed as the medical Director at FCI Beckley, Harley Lippie is employed as the Director of the Federal Bureau of Prison Central Office

in Washington D.C., Doctor Ellis is employed as Chief of Psychology, at FCZ Beckley, John Lee is employed in the Population Management Department at the Federal Bureau of Prison Mid-Atlantic Regional Office, Harley Lappin, is employed as the Director of the Federal Bureau of Prison, Jeff James is employed as an Correctional Officer at FCZ Beckley, and Dan Greenwald is employed as the Food Service Director at FCZ Beckley.

IV. Statement of Claim

State here as briefly as possible the facts of your case. Describe how each defendant is involved. Include also the names of other persons involved, dates and places. Do not give any legal arguments or cite any cases or statutes. If you intend to allege a number of related claims, set forth each claim in a separate paragraph. (Use as much space as you need. Attach extra sheet if necessary.)

1. The Administrative Remedies is inadequate and ineffective where the Prison officials has knowingly and intentionally ignored and interfered and continues to ignore and interfere with plaintiff's attempts to pursue and exhaust his Administrative Remedies. Plaintiff has submitted more than one-hundred (100) requests to Prison officials, and as soon as presented his complaints to Prison officials more than Fifty (50) times. As well as completed Administrative Remedies Forms.

Defendant Anderson is involved where he is the warden, where he is responsible for the Administrative Remedies Program. As well as the fact that plaintiff has submitted him more than sixty cap-cot about the majority of each of the complaints stated in this complaint, and the fact that plaintiff's attempts to exhaust his Administrative Remedies is being ignored and interfere with the Prison officials.

Defendant Eyles is involved where she is the Associate Warden, where plaintiff has submitted more than fifty cap-cots to Eyles.

about his attempt to pursue and exhaust his Administrative remedies is being ignored and interfered with.

Defendant Bonat is involved where he is the Unit Manager whom is the head of the housing unit in which this claim arose from. Where plaintiff has submitted more than one hundred cop-out to Bonat, about a number of complaints. Plaintiff has spoken with Bonat verbally more than thirty times about his attempt to use the Administrative Remedy is being denied. Where himself Bonat, and Defendant Midgley keep refusing to provide him with an Internal Resolution Form, and B-P9, and related Administrative Forms.

Defendant Midgley is involved where he is Correctional Counselor for the housing unit where this claim arose. Where plaintiff has submitted more than one hundred cop-outs to Midgley, about complaints in which would like to be loged on the proper Internal Resolution Form, as well verbally presented his complaints to Midgley and related Administrative Remedy Forms.

Detention Russell is involved where he is the Associate Warden, whom is over the Program where plaintiffs are sentenced more than fifty days to Russell. About the Administrative Remedies begin inadequate and ineffective and other complaints.

2. The Prison Officials has detention against plaintiff and continue it's retaliation where plaintiff is being harass by Prison Officials, threaten that if he quit it's deal get into the Program he will not in Administrative Detention. Has place plaintiff in Administrative Detention without due process. Has assign plaintiff to a work detail to interfere with plaintiff's access to the law library, thus assign plaintiff to a 6 man cell space to plaintiff request to be assign to a two man or one man cell. Has refuse to provide plaintiff a job change. Has treated plaintiff differently in occasion different from similar prisoners.

Defendant Anderson is involved where he is the warden whom I verabily mention to him and submitted multiple cop-outs to about this retaliation. yet he fail to investigate into this complaint.

Defendant Engles is involved where she is the Associate warden whom verabily told me that she would not accept multiple cop-out from me and that if I don't get with the program I would not be Administrative Detention, whom is also aware of other Prison Official Retaliation against me where I have submitted her multiple cop-outs stating such.

Defendant Howell is involved where he is the unit manager of the housing unit plaintiff was assign to when this (these) claim arose, where defendant verbally told plaintiff that, he carries much paper work and he would not be assign to a full man cell and would be be granted a job change regardless of his health and or low blood sugar.

Defendant Midgley is involved where he is the Correctional Counselor for the housing unit where this claim arose. Where plaintiff has presented defendant more than one-hundred cap-acts which consist of a job change or and to be move to a two man cell. Yet defendant verbally told plaintiff that your BLACK ass don't get nothing coming from him where all plaintiff has to do is write cap-acts and attempt to write people up.

3. The design setting of inmates in a cell designed for two inmates and twelve inmates in a dormitory design to be a television room is unsanitary. Where inmates in a High Security and/or Medium Security are supposed to be housed in either a one or two man cell or in the modern design medium security facilities in a one or two man room. The setting of three inmates to a cell and twelve inmates to a dormitory has cause unsanitary, dangerous, health, identifiable needs, and both physical and emotional conditions.

Defendant Anderson is involved where he is the Warden. Where plaintiff submitted multiple cap-out to Anderson, about the tripple celling of inmates and the placement of twelve inmates in a dormitory is unconstitutional.

Defendant Bonnet is involved where he is the Unit manager. Where plaintiff has submitted multiple cap-out to Bonnet stating that the tripple celling of inmates and the placement of twelve inmates a dormitory is unconstitutional. As well as requested to be moved out of the twelve man dormitory to a two man cell. And that the tripple celling and twelve man dormitory be stop.

Defendant Midgley is involved where he is the Correctional Counselor. Where plaintiff has submitted multiple cap-outs to Midgley requesting to be move to a two man cell.

7. The Prison is severely overcrowded causing tripple celling, housing of twelve

inmate to a territory, unsanitary conditions, insufficient showers, insufficient amount of telephones, denial of hygiene supplies, denial of jobs, less pay for work detail and programs.

Defendant Hinderson is involved where he is the warden where defendant is aware that the population is severely overcrowded, yet the defendant has fail to recommend to the Regional Director that a moratorium on population cap be established and or for a mental moratorium is necessary while a complete cessation of all initial designation and redesignation to an institution be made.

Defendant John Doe is involved where he/she is the population manager for the Mid-Atlantic Region.

Defendant Happin is involved where he is the director of the Federal Bureau of Prisons.

5. The Prison officials is negligence in its malpractice by refusing to treat plaintiff's hand and back injuries and feet conditions.

Defendant Ineiser is involved where he is an Physician whom is aware of plaintiff's medical conditions.

Defendant Dr. McLain is involved where he is the medical director, and has been inform by plaintiff that he (plaintiff) has yet to received adequate medical treatment for his hand, back and feet.

6. The Prison officials fail to provide me medication for my back injury, where I was told medical do not give out over the counter medicine and over the counter medicine can be purchase through commissary. Even when I explain that I was indigent and could not afford my medicine from commissary I was still denied medicine.

Defendant Heiser is involved where he is the Physician whom plaintiff saw for his back injury (pain).

Defendant Anderson is involved where he is the Warden, and is responsible for the implement of policy and procedure. And for allowing medical to refuse to provide inmate medicine unless they are on an indigent list.

7. The prison officials are deliberate indifferent to plaintiff and other prisoner medical needs by requiring both plaintiff and all other prisoner to purchase over the counter medicine from commissary.

Defendant Anderson is involved where he is the Warden, and he is allowing such practice to go on.

Defendant De Meira is involved where he is the Medical Director and he is also allowing such practice to go on.

Defendant Kappas is involved where he is the Director of the Federal Bureau of Prison and he is allowing such practice to go on.

F. The Prison Officials is denying plaintiff and other Muslims inmate their right to practice their Religious belief. Where the defendants will not allow plaintiff and other Muslims to offer prayer on work details, in the common area of the housing units, while at recreation, and or to congregate to make prayer. Where it is obligatory for Muslims to pray ~~at~~ five times and to pray in congregation.

Defendant Hines is involved where he is the warden and is aware of this complaint.

Defendant Hutchings is involved where he is the Captain, and is aware of this complaint were he in part is responsible for this denial.

Defendant Lang is involved where he is the Captain and is aware of this complaint.

and the required manner Muslims are required to pray.

Defendant Blair is involved where he is the Chaplain, and is aware of this complaint and the required manner Muslims are required to pray.

9. The Prison Officials are discriminating against Plaintiff and other Muslims inmates and other inmates whom would like to attend Jumar (Religious) services. Where in order to attend Jumar Muslims and some other inmates whom would like to attend Jumar must have an Jumar card and their name place on a callout every Friday where no other Religious faith groups is required to do so.

Defendant Anderson is involved where he is warden, and is aware of this complaint.

Defendant Hutchings is involved where he is the Captain and is aware of this complaint.

Defendant Long is involved where he is the chaplain and is aware of this complaint.

Defendant Blain is involved where he is the chaplain and is aware of this complaint.

Defendant Russell is involved where he is the Associate Warden for Programs and is aware of this complaint.

10. The Prison officials are forcing plaintiff to choose between purchasing hygiene supplies, photo copies of legal papers and other essential legal supplies while there has been a number of times plaintiff account and income for the previous thirty (30) days did not exceed seven (7) dollars.

Defendant Remond is involved where plaintiff has asked defendant several times for photocopies, paper, envelopes, paper and stamps for various legal works. Yet the defendant states was unable to purchase what was needed until the money was sent.

Defendant Midgley is involved where plaintiff has asked defendant several times for legal copies, proof envelopes, paper and stamps. Defendant stated you have to purchase what you want with the money you have.

Defendant Farley is involved where he is the Supervisor of Education where the Law Library is an part of Education. Yet he has implemented no alternative source for indigent inmates to received free copies of legal pleadings. Farley has implemented a Xerox machine that charges fifteen (15) cents per page.

Defendant Blankenship is involved where she is School Principal of Education where the Law Library is an part of Education. Yet she has implemented no alternative source for indigent inmates to received free copies of legal pleadings.

11. The Prison Law Library is inadequate where the Law books are more than eight years old in some areas and four to seven in other areas. And where there is no staff and or train law clerk working in the Law Library to assist plaintiff and or any other inmates.

Defendant Farley is involved where he is aware of this complaint, and has made no attempt to replace the old outdated books, to hire a train inmate law clerk and or train staff law clerk.

Defendant Blankenship is involved where she is aware of this complaint, and has made no attempt to replace the old outdated books, to hire a train inmate law clerk and or a train staff law clerk.

12. District of Columbia, prevent sentence out of the Superior Court of the District of Columbia access to the courts is

being abstracted and denied were the Prison Law Library does not have District of Columbia Superior Court Criminal Rules, Civil Rules, Jury instructions, and or District of Columbia Court of Appeals Appellate Rules. And a inmate law clerk and or staff member that know the District of Columbia Superior Court Criminal Rules, Civil Rules, Jury Instructions and or District of Columbia Court of Appeals Appellate Rules. This making plaintiff and other District of Columbia prisoners post conviction remedies impossible to file in a timely and or in a meaningful manner.

Defendant's Planter'ship is involved where she is the School Principal of Education where the Law Library is a part of. And where plaintiff has verbally presented this same plaintiff to defendant.

Defendant's Father is involved where he is the Supervisor of the Prison where the Law Library is a part of. And where plaintiff is a inmate and defendant is a inmate and plaintiff is a inmate and defendant is a inmate.

Dr. Edward House - mentioned where he is
the time in relation to the case. An answer
planted in the house in hope of getting to
ascertain about the complaint.

13. Estimates being based on Roman numerals the definition is being denied access to the court some estimates are only guesses and many inches of legal materials, as are from the Canadian Republic went to the end of type of legal books and or legal materials to inmates in Administrative detention there are no available records for inmates to obtain legal materials from the law library and identification of potential new library is inadequate where it has been kept the Law Books and other legal materials.

Defendant's membership is revoked where there is no the school's approval of the officer whose name was submitted as a part of the defendant's "list" and is usually presented with complaints to the Defendant and submitted multiple reports for the Defendant's attorney regarding the matter (see exhibit 29a).

Defendant Finner is involved where he is the Supervisor of Education where the term follows in part of.

14. The Plaintiff also has placed plaintiff in Administrative Detention without due process and continue to do so in violation for the good faith filing of multiple cap only attempts to file Administrative remedies, and verifiably complaints to various prison officials knowing that plaintiff is being housed in Administrative Detention without due process.

Defendant Anderson is involved where he is the warden, who where plaintiff has submitted multiple cap only to the defendant about this complaint and where defendant is a part of the conspiracy to conspire co-habitation against plaintiff.

Defendant Russell is involved where he is the Associate Warden of Program, and where plaintiff has submitted multiple cap only to defendant about this complaint.

Defendant Smith is involved where he is the Captain and where "multiple cap only" are

multiple copies of the document, a clear and

unambiguous

Defendant's Board of Directors will be
 notified of the Manager's and other records
 that submitted multiple copies to the defendant
 about the company's conduct in order to
 put all the companies to some realization
 against plaintiff.

Defendant's Manager, however, is not
 notified of the company's conduct in order to
 put all the companies to some realization
 about the company's conduct in order to
 put all the companies to some realization
 against plaintiff.

Defendant's Board of Directors is involved in the
 company's conduct in order to put all the
 companies to some realization about the
 company's conduct in order to put all the
 companies to some realization against
 plaintiff.

15. The defendant's Board of Directors is not
 an adequate person program for other
 persons involved in the company's conduct
 and the defendant's Board of Directors is not
 an adequate person program for other
 persons involved in the company's conduct

prison. The prison pattern is transfer and
 of other prisoners. Services & inmates
 especially towards the prison. March 1997.

Defendant Anderson is involved in the
 is the warden and he is aware of the fact
 that an inmate was killed in the prison on or about
 March 3, 1997.

Defendant Dossell is involved in the
 in the prison. He is the warden, and he is
 aware of the fact that an inmate was killed
 on or about March 3, 1997.

Defendant Williams is involved
 in the prison. He is the warden, and he is aware
 of the fact that an inmate was killed on or about
 March 3, 1997.

Defendant Dr. Ellis is involved
 in the prison. He is the warden, and he is aware
 of the fact that an inmate was killed on or about
 March 3, 1997.

16. The Prison official acted with recklessness and indifference when it was known to the Prison official and other inmates that the inmate whom committed suicide on or about March 3, 2004, displayed suicidal tendencies and even made one or more prior attempts during the week of March 3, 2004, to commit suicide, while the Prison official fail to provide the inmate with any type of counseling and psychological assistance.

17. Defendant Anderson is involved where he is the warden and is aware of this complaint.

Defendant Hutchings is involved where he is the Captain, and through his staff member it became known to him that the inmate whom committed suicide on or about March 3, 2004, made at least one or more prior attempts to commit suicide during the week of March 3, 2004.

17. The Prison official that assign plaintiff to a tiered work community despite plaintiff request to be assigned to some other tier.

in retaliation for plaintiff's good faith filing of
report, verbiage complaining about the prison
conditions, and plaintiff attempt to use
the Administrative Remedies.

Defendant Russell is involved where he is
the Associate Warden of Progress, and
where plaintiff submitted his complaint
to defendant by way of multiple reports.

Defendant Engles is involved where since
the Associate Warden and oversees the
housing unit where this complaint arose and
where plaintiff he submitted this complaint
to defendant by way of multiple reports.

Defendant Rorat is involved where he is
the Unit Manager where the complaint
arose and where defendant knowingly and
intentionally assign plaintiff to a single
man dormitory despite plaintiff request to
be assign to a two man cell where such
was available. And where plaintiff submitted
multiple reports to defendant requesting
to be move out of the two man dormitory
into a cell.

Defendant Miley is involved where he is the counselor in the housing unit where this complaint arose and where defendant knowingly and intentionally refuse to move plaintiffs from the twelve man dormitory despite plaintiff submitting multiple requests to defendant requesting to be moved out of the twelve man dormitory to a two man cell where there are a number of two man cells with only one inmate in them.

14. The prison officials has failed to ensure that the work assignments are racially balanced.

Defendant Russell is involved where he is the Associate Warden of Prisoners and is aware of the racial imbalance work assignments.

Defendant Rouse is involved where he is plaintiff's Unit Manager and is responsible for ensuring that work assignments are racially balanced or is responsible for assigning white inmates and all other inmates jobs of their choice for the discrimination against plaintiff in work assignments.

Defendant Alleges is involved where the plaintiff consents and is responsible for ensuring that work assignments are mutually balanced. And in discriminating against plaintiff in work assignments.

19. The Miller & Elick insurance are entirely
confiscated and all money destroyed, stolen
+ personal property

Defendant Foster is involved where he is the driver when wife responsible for inventory and packing plaintiff's property.

20. The Motion cannot then proceed to be
assailed by an Appeal, and will
be taken into action on plaintiff's claim.

Defendant Wilson is involved where he is the warden and where plaintiff submitted this complaint or a copy of it to the defendant.

Defendant Holdings is involved where he is the Captain and is responsible for the fact the company is now left out to the Defendant.

Defendant Pitt is involved where he is the one whom actually assaulted plaintiff by punching plaintiff in the side and by putting plaintiff down through the food slot while one of plaintiff's arms were still handcuffed.

31. Officer David Pitt knowingly and intentionally wrote and false incident report on plaintiff in order to or attempt to cover up an material fact where he assaulted plaintiff.

Defendant Pitt is involved where he is the one whom wrote the false incident report on assaulted plaintiff.

32. The defendants are maintaining incorrect information in plaintiff's files, and has used the incorrect information to make decisions adverse to plaintiff and to adversely affect plaintiff and has fail to correct the incorrect information.

Defendant Rorick is involved where he is plaintiff's unit manager, and has fail to have knowledge of the complaint by plaintiff thereby preserving this complaint to defendant.

And by defendant knowledge that plaintiff has filed an Equal Claim and related discrimination issues with the subjects.

Defendant Burlington is involved where he is the Regional Counsel when state attorney denied of my test claim.

32. The other officials is denying plaintiff to participate in approved program order by the court by refusing to put plaintiff in for an Educational transfer to another facility other than it's Facility that has an Residential Drug Program where plaintiff has already meet the necessary criteria for admission and signed an agreement to participate in a Residential Drug Program and which plaintiff is within thirty-six months of his projected released date,

Defendant Murray P.D. is involved where he is the Residential Drug Abuse Treatment Coordinator when has fail to make an referred through the state attorney and it is clear that plaintiff meet the requirements and has signed an agreement to

participate in the Residential Drug Treatment Program. As well as submitted an offer of defendant's readiness can transfer to another facility to participate in the Residential Drug Treatment Program.

Defendant Rorick is involved where he is plaintiff Unit Manager and has failed to act on plaintiff's request to be transferred to another facility to participate in the Residential Drug Treatment Program.

22. The Prison officials are liable plaintiff to participate in the inmate theoretical responsibility program, due to a court assessment imposed more than eight years ago. Although the court did not specify who plaintiff was to pay the assessment and as the Prison official to act as an collector of money for the court.

Defendant Rorick is involved where he is plaintiff Unit Manager and has failed to accept plaintiff from the defendant's money for the assessment and as the Prison

more than eight (8) years ago and the court did not state that plaintiff must pay the assessment while incarcerated and nor as the prison officials to act as an collection agency for the court.

36. The Prison officials has fail to act of plaintiff request that a separation be place between plaintiff an officer DePratt, where plaintiff has submitted multiple request to requesting that officer Pratt be kept away from him where plaintiff was assaulted by officer Pratt, officer Pratt refused to feed plaintiff, and stated to plaintiff don't "your Black ass be the next one whom is found to have committed suicide in there cell."

Defendant Anderson, is involved where he is the warden, and plaintiff has submitted multiple request to the defendant requesting to be separated from officer Pratt.

Defendant Russell is involved where he is the Associate warden, and plaintiff has verbally requested to the defendant and submitted multiple request to defendant requesting to be seperated from Officer Pratt.

Defendant Hutchings, is involved where he is the Captain, and plaintiff has verbally requested to defendant and submitted multiple request to defendant requesting to be seperated from officer Pratt.

Defendant Ronut, is involved where he is an Unit manager, and plaintiff has verbally requested to defendant and submitted multiple request to defendant requesting to be seperated from officer Pratt.

Defendant Lappin is involved where he is the Director of the Federal Bureau of Prison and plaintiff has submitted a letter to him requesting to be seperated from Officer D. Pratt.

37. The Prison Officials due not have cameras install in the Administrative Detention unit nor are video cameras use when placing an inmate in or removing an cell.

Defendant Anderson is involved where he is the warden and where he is aware that there are no cameras in the Administrative Detention and no video cameras are use.

Defendant Hutchings is involved where he is the Captain whom is responsible for security and where he is aware that there are no cameras in Administrative Detention and video cameras are not use.

38. The Prison Officials when placing inmate in a cell and or removing and inmate from a cell in Administrative Detention place the inmate in the cell and remove the inmate from the cell with handcuffs or where the other inmate in the cell never handcuffed.

Defendant Hutchings is involved where he is the Captain, whom is responsible for security.

39. The Prison officials are issuing inmate hygiene supplies once a month.

Defendant Litter is involved where he is the Laundry Supervisor when it comes to this practice.

40. The Prison officials are charging inmates prices in commissary more than people in society pay for the same items.

Defendant Litter is involved where he is the Commissary Supervisor when it comes to this price.

41. The Prison officials are charging inmates higher prices for long distance phone calls than people in society pay for long distance phone calls.

Defendant Litter is involved where he is the Director of the Federal Bureau of Prisons and is aware of phone costs for long distance phone calls.

42. The Prison officials do not admit inmates on a number of other D.C. Code offenders earn good time and or educational good time where other federal prisoners are given such good time and educational good time.

Defendant Russell is involved where he is the Associate Warden of Programs and he is aware that D.C. Code offenders aren't being given good time.

43. The Prison officials has yet to comply with its Affirmative Action Program Policy where there are very few Black staff employees and or other minority.

Defendant Anderson is involved where he is the warden and has made no attempt to implement an Affirmative Action Program.

Defendant Tappin is involved where he is the Director of the Federal Bureau of Prisons in which FCI Beckton is one of the Prisons.

44. Plaintiff has been placed in Administrative Detention without due process where, the Prison knowingly and intentionally fail to provide plaintiff an Initial Hearing within three working days for a disciplinary report.

Detendant Bonet is involved where he knew that plaintiff was not provided an Initial Hearing within three working days.

Detendant Engles is involved where said submitted an approval for extension of time after the fact was established that plaintiff was not provided an Initial Hearing within three working days. And without providing me a copy of the reason for an extension.

45. Plaintiff was deprived of an an right to a fair Disciplinary Hearing where Officer James submitted an approving false statement to the Disciplinary Hearing officer.

Defendant James is involved where he is the Officer, whom knowingly and Intentionally submitted an knowingly false statement to cover up an material fact of an act committed by one of his fellow officer Pitt.

46 The Prison officials knowingly and Intentionally treated plaintiff differently than similar prisoner by knowingly and Intentionally held plaintiff in Administrative Detention for forty days. ~~Before~~ plaintiff was even attended on disciplinary hearing, where petitioner was not even given credit for the forty days he spent prior to seeing the disciplinary Hearing officer.

Defendant Anderson, is involved where he is aware that plaintiff spent forty days in Administrative Detention prior to seeing the Disciplinary Hearing officer.

Defendant Hutchings is involved where he is the Captain an allow such to take place.

47. The Prison officials has failed to in place an entrance and exist to food service and or a table for wheelchair prisoners.

Defendant Anderson is involved where he fully aware of this issue.

Defendant Greenwalt, is involved where he is the Food Service Director.

48. The Prison officials are treating petitioners differently than similar prisoners by not providing plaintiff with services from our counselor, case manager and or Unit manager.

Defendant Anderson is involved where plaintiff has submitted several letters to defendant stating that his unit team refuses to come out to see him and or respond to his requests.

49. The Prison Officials are deliberately Indifferent to Plaintiff safety and life. By refusing to place curb

between officer Pratt whom plaintiff has specifically stated that he was assaulted by officer Pratt, and officer Pratt has threatened plaintiff on at least one or more instances that he will kill plaintiff.

Defendant Anderson is involved where plaintiff has submitted several reports to defendant stating that he would like for an separation to be placed between officer Pratt and himself. Based on officer Pratt assaulting plaintiff and threatening plaintiff.

Defendant Hutchings is involved where plaintiff has submitted several reports to defendant requesting to be separated from officer Pratt were officer Pratt assaulted him, threaten him as well as officer Pratt has falsely accused plaintiff of assaulting him.

V. RELIEF:

State briefly exactly what you want the Court to do for you. Make no legal arguments, cite no cases or statutes.

1. That the defendants stop retaliating against plaintiff for his good faith filing of requests and attempt to use the administrative remedies
2. That the defendants allow muslim inmates to make congregation prayer in the housing unit common area, at work and while at recreation
3. That the District of Columbia Superior Court Enjoined Rules and Appellate Rules be used
4. For the court to issue an emergency injunction order to the defendants to stop Harassing plaintiff and Retaliating against plaintiff.
5. For the court to issue an order to the Director of the Bureau of Prison at Hoxley Capital Center the appropriate Federal Bureau of Prison to have plaintiff transferred out of the BOP back to the another FBI house in the vicinity of the Washington and the Department of Home Affairs as soon as possible.

6. That an Audit Team be sent to the FCI Beckley to audit and summarize the contents of this complaint which shall consist of interviewing inmates.

7. That the defendants be ordered to stop mistreating and ignoring plaintiff and other inmates attempts to exhaust their Administrative Remedies.

8. That the defendants stop harassing, since plaintiff in a two month call was twice harassed in a way as to design to be a [teller.com](http://www.teller.com).

9. That the Director of the Bureau of Prison place moratorium on population cap on FCI Beckley and establish a total moratorium.

10. That the defendants stop charging inmates for medicine.

That the defendants provide plaintiff adequate medical treatment for his hands, back and feet.

11. That the Prison official allow plaintiff and all other Muslims to practice their Religious belief in accordance with the proscribed manner. In which consist of making congregational prayers which may be necessary to make in the housing unit common areas, and on work details.
12. That the Prison officials allow plaintiff all other Muslims and any other inmate whom wish to attend Jummah on Friday be allowed to attend without having an pass and or having their NAME PLACE ON A call out.
13. That the Prison official stop forcing plaintiff to choose between purchasing hygienic supplies, photocopies of legal papers and other essential legal supplies when there come any time when plaintiff is indigent or plaintiff account be not exceed seven dollars for the previous 30 days.

14. That the Defendants update the law books in the law library and to assign a train staff and or inmate clerk to work in the law library.
15. That the Defendants allow inmates whom are being house in Administrative Detention be allowed to possess as much of these legal papers and other materials as relevant to there pending cases.
16. That the Defendants upgrade the law library in Administrative Detention and set up some type of programs for inmates in Administrative Detention to be able to obtain Xerox copies of legal books, cases, rules and or other legal materials from the regular law library.
17. That the Defendants ~~establish~~ an suicidal prevention program.
18. That the Defendant assign plaintiff and all other inmates to a two man cell.

19. That the Defendants ensure that all of the work assignments are socially balanced.
20. That the Defendants replace all of plaintiff's personal property lost on or about February 7, 2004.
21. That the Defendants suspend Officer Pritch for thirty days with pay for assaulting plaintiff.
22. That the Defendants remove the false incident report Officer Pritch wrote on plaintiff on or about April 7, 2004.
23. That the Defendants correct the incorrect information in plaintiff's files.
24. That the Defendants transfer plaintiff to another facility in order to participate in the Residential Outpatient Treatment Program.

25. That the Defendant install camera's in the Administrative Detention Housing Unit.
26. That the Defendant provide inmates with hygiene supplies as needed.
27. That the Defendant lower its commissary prices consistent with the prices in the store in society.
28. That the Defendant lower its long distance phone rate consistent with the long distance phone rate in society.
29. That D.C. code officer be awarded good time credit.
30. That the Defendant establish and Affirmative Program consist with its policy.
31. That the Defendant make available a video camera for Administrative Detention inmates.

32. That plaintiff be exempt from the Inmate Financial Responsibility Program.

33. That the Defendant stop acting as an collection Agency for the Court (the Super Court of the District of Columbia) etc.

34. That the disciplinary report plaintiff received on April 7, 2004, Be removed from plaintiff's file.

35. That Officer James be recommended for punishment for knowingly false statement to the disciplinary Hearing Officer.

36. That the Prison Officials make available an entrance and a exit for wheelchair prisoners and a table, in Food Service.

37. That the Prison Officials place an Separation between Plaintiff and Officer Pritch, where Plaintiff has been assaulted by Officer Pritch and continues to be threaten by Officer Pritch. And where Plaintiff states that his life is endangered by being house

around. Officer Pritch. That either officer Pritch and of Plaintiff should be transferred out of FCI Beckley as soon as possible.

38. That the Prison officials provide plaintiff assistance from an Unit Team other than his current assign you team where they are named as an defendant case,

39. That plaintiff be awarded 500,000 Five-Hundred Thousand Dollars for monetary damages. (Paid by defendant(s)).

40. That plaintiff be awarded 500,000 Five-Hundred Thousand Dollars for Punitive damages. (Paid by defendant(s)).

VII. Counsel:

A. If someone other than a lawyer is assisting you in preparing this case, state the person's name:
N/A